

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

**IN RE GOOGLE INC. COOKIE
PLACEMENT CONSUMER PRIVACY
LITIGATION**

Case No. 12-MD-2358 (SLR)

**This Document Relates to:
All Actions**

**MOTION OF CLASS COUNSEL FOR ATTORNEYS' FEES, EXPENSES, AND
INCENTIVE AWARDS FOR CLASS REPRESENTATIVES**

Class Counsel respectfully move the Court for an award of attorneys' fees and reasonable expenses incurred on behalf of the Class in the prosecution of this litigation pursuant to Federal Rules of Civil Procedure 54(d)(2) and 23(h), and for an Order permitting the payment of Incentive Awards to the three Class Representatives.

Class Counsel seek, and Defendant Google Inc. ("Google") does not contest, attorneys' fees and expenses in the total amount of \$2,497,000 as a reasonable payment of attorneys' fees and expenses incurred in the prosecution of this case against Google and, if approved by the Court, will be paid from the Settlement Fund. As set out in the Motion for Preliminary Approval (D.I. 163), and included in the Notice materials made available to Class Members, the attorneys' fees and expenses requested is in this liquidated amount and will be paid by Google. As explained more fully in the accompanying Memorandum, the requested fee is well within the reasonable range when measured against the actual time and expense incurred by Class Counsel.

Finally, Class Counsel ask the Court to award \$1000 per Class Representative as an Incentive Award for their efforts on behalf of the Class.

WHEREFORE, for the reasons stated and as supported by the accompanying Memorandum, Class Counsel request that the Court enter an Order as follows: awarding attorneys' fees and expenses in the amount of \$2,497,000, permitting the payment of Incentive Awards of \$1000 per Class Representative, and for such other and further relief as the Court deems appropriate.

Dated: December 7, 2016

Respectfully submitted,

**SILVERMAN THOMPSON SLUTKIN
WHITE**

/s/ Stephen G. Grygiel
Stephen G. Grygiel (DE Bar ID #4944)
201 N. Charles Street, 26th Floor
Baltimore, MD 21201
Tel: 443-909-7516
sgrygiel@mdattorney.com

Executive Committee Member

**BARTIMUS, FRICKLETON,
and ROBERTSON, P.C.**

/s/ James P. Frickleton
James P. Frickleton
Mary D. Winter
Edward D. Robertston, Jr.
11150 Overbrook Road, Suite 200
Leawood, KS 66211
Tel: 913-266-2300
jimf@bflawfirm.com

Executive Committee Member

STRANGE & BUTLER LLP

/s/ Brian Russell Strange
Brian Russell Strange
12100 Wilshire Boulevard, Suite 1900
Los Angeles, CA 90025
Tel: 310-207-5055
bstrange@strangeandbutler.com

Executive Committee Member

LOCAL RULE 7.1.1 STATEMENT

No party to this proposed Settlement opposes the relief sought in this motion.

Dated: December 7, 2016

/s/ Brian Russell Strange

Brian R. Strange